

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460





Office of Pesticide Programs

**MEMORANDUM**

11/20/2019

**SUBJECT:** Product Chemistry Review for **Ultra Palmolive Antibacterial Dish Liquid**,  
EPA Reg. No.: **4582-72**

**FROM:** Bruce A Averill   
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**THRU:** Karen P. Hicks, Team Leader   
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Jacqueline Hardy, PM Team 34 / Lorena Rivas  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Registrant: Colgate-  
Palmolive Company  
Action code: A570  
Agency Due Date:  
12/2/2019  
DP No.: 453600  
Submission No.: 1037368  
E-Sub No.: 40957  
Classification: EP  
Process: Nonintegrated  
system  
Pesticide type:  
Disinfectant

MRID(s): 50875801, 50875802, 50875803

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
128929	79-33-4	L-Lactic acid	2.00
		Other Ingredients	98.0
		Total	100%

**I. BACKGROUND**

On behalf of the Registrant, Colgate-Palmolive Company, Lewis & Harrison has submitted a minor formulation amendment for their product: Ultra Palmolive Antibacterial Dish Liquid, EPA Reg. No. 4582-72. They are requesting approval of two new alternate formulations.

## II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (7/11/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (7/11/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSF ALTERNATE 31, (7/11/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF ALTERNATE 32, (7/11/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (5/23/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF Alternate Formulation 29 (12/4/2017)	--	
Comments:		

## III. FINDINGS

### a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)	Nominal		Upper limit	Lower limit	
L-Lactic acid	2.00		2.10	1.80	
	<b>YES</b>		<b>NO</b>	<b>N/A</b>	
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>		<input type="checkbox"/>	X	
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	

5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### IV. Additional Findings

The CSFs for alternate formulations #31 & 32 (dated 7/11/2019) are acceptable. The certified limits for all ingredients agree with 40 CFR §158.350. All ingredients have been cleared for use in pesticide formulations. Percentages on label match composition of product.

#### V. Conclusion

The registrant has satisfied the CSF requirements for registration of new alternate formulations #31 & 32 of EPA Reg. No. **4582-72**. EPA approves said CSFs.

**VI. Table A:****Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	47565401
830.1600	Description of materials	Acceptable	50875801
830.1620	Description of production process	Waived	N/A
830.1650	Description of formulation process	Acceptable	50875801
830.1670	Discussion of formation of impurities	Waived	N/A
830.1700	Preliminary analysis	Acceptable	47565401
830.1750	Certified limits	Acceptable	47565401
830.1800	Enforcement analytical method	Acceptable	47565401
830.1900	Submittal of samples	Acceptable	N/A

**VII. Table B: Series 830 guidelines – Group B**

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Pale yellow	Acceptable	47565402
830.6303	Physical state	liquid	Acceptable	47565402
830.6304	Odor	Not required for end use product	Waived	N/A
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA	Waived	N/A
830.6314	Oxidation/Reduction	No oxidizer/reducer present	Acceptable	47565402
830.6315	Flammability	Flash point ca. 146F	Acceptable	50875802, 50875803
830.6316	Explosibility	Product does not contain explosive ingredients	Waived	N/A
830.6317	Storage stability	Acceptable	Acceptable	47565403
830.6319	Miscibility	Product not mixed with organic solvents	Waived	N/A
830.6320	Corrosion characteristics	Not corrosive	Acceptable	47565403
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Waived	N/A
830.7000	pH	3.1	Acceptable	50875802, 50875803
830.7050	UV/Visible absorption	Not required for MUP or EP	Waived	N/A
830.7100	Viscosity	450-850 cP	Acceptable	47565402
830.7200	Melting point	Not required for MUP or EP	Waived	N/A
830.7220	Boiling point	Not required for MUP or EP	Waived	N/A
830.7300	Density/relative	8.57 lb/gal	Acceptable	50875802, 50875803
830.7370	Dissociation constants in water	Not required for MUP or EP	Waived	N/A
830.7520	Particle size	Not required for MUP or EP	Waived	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Waived	N/A

830.7840/ 7860	Water solubility	Not required for MUP or EP	Waived	N/A
830.7950	Vapor pressure	Not required for MUP or EP	Waived	N/A

